

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Ralph I. Miller
Peter Gruenberger

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: : Chapter 11
LEHMAN BROTHERS HOLDINGS INC., *et al.* : Case No. 08-13555 (JMP)
Debtors. :

LEHMAN BROTHERS SPECIAL FINANCING INC. :
and
LEHMAN BROTHERS HOLDINGS INC.
Plaintiffs, :
-against- : Adversary Proceeding
AMERICAN FAMILY LIFE ASSURANCE COMPANY :
OF COLUMBUS : No.: 09-1261 (JMP)
and
BNY CORPORATE TRUSTEE SERVICES LIMITED :
Defendants. :
:

**STIPULATION REGARDING BRIEFING SCHEDULE AND HEARING
FOR CROSS-MOTIONS FOR SUMMARY JUDGMENT**

The parties to this adversary proceeding (the “Parties”), plaintiffs and counterclaim defendants Lehman Brothers Special Financing Inc. (“LBSF”) and Lehman

Brothers Holdings Inc. (“LBHI” and, together with LBSF, Debtors), intervenor plaintiff and counterclaim defendant the Official Committee of Unsecured Creditors (together with Debtors, “Plaintiffs”), and defendants and counterclaim plaintiffs American Family Life Assurance Company of Columbus (“Aflac”) and BNY Corporate Trustee Services Limited (“BNY”), by and through their undersigned counsel, stipulate and agree as follows:

1. The following schedule shall govern the pending motion for summary judgment filed by Aflac and cross-motions for summary judgment proposed to be filed in the above-captioned action:
 - a) Plaintiffs and BNY shall file any motions for summary judgment by September 25, 2009.
 - b) The Parties shall file any responses to the motions for summary judgment by October 23, 2009.
 - c) The Parties shall file any replies in support of their motions for summary judgment by November 9, 2009.
 - d) The Court will conduct a hearing on the motion described above on November 19, 2009 at 10:00a.m, or any other date which is convenient for the Court, either immediately before, immediately after, or at the same time as the hearing in Case No. 09-1242 (JMP).
2. Any party may, for good cause shown, seek to modify the foregoing schedule.
3. This stipulation is executed and entered into without prejudice to the claims or defenses of the Parties.

Dated: August 14, 2009
New York, New York

Dated: August 14, 2009
Wilmington, Delaware

WEIL, GOTSHAL & MANGES LLP

BY: /s/ Ralph I. Miller
Ralph I. Miller

767 Fifth Avenue
New York, New York 10153
Tel: (202) 682-7000
Fax: (202) 857-0940

Counsel for Plaintiff Lehman Brothers
Special Financing Inc.

Dated: August 14, 2009
Pittsburgh, Pennsylvania

REED SMITH LLP

BY: /s/ Eric Schaffer
Eric Schaffer

Eric Schaffer
225 Fifth Avenue
Pittsburgh, PA 15222
Tel: (412) 288 3131
Fax: (412) 288 3063

Counsel for Defendant BNY Corporate
Trustee Services Limited

SO ORDERED:

Dated: August 20, 2009
New York, New York

/S/ James M. Peck
UNITED STATES BANKRUPTCY JUDGE

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP

BY: /s/ Robert A. Weber
Robert A. Weber

One Rodney Square
P.O. Box 636
Wilmington Delaware 19899-0636
Tel: (302)651-3144
Fax: (888)329-2975

Counsel for Defendant American Family Life
Assurance Company of Columbus

Dated: August 14, 2009
Washington, D.C.

MILBANK, TWEED, HADLEY & McCLOY
LLP

BY: /s/ David S. Cohen
David S. Cohen

1850 K Street, NW
Suite 1100
Washington, DC 20006
Tel: (202) 202-835-7500
Fax: (202) 263-7586

Counsel for the Official Committee of
Unsecured Creditors of Lehman Brothers
Holdings Inc., *et al.*